

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

WISCONSIN GAS LLC,

Plaintiff,

v.

Case No. 2:20-cv-1334

AMERICAN NATURAL RESOURCES
COMPANY and HONEYWELL
INTERNATIONAL, INC.,

Defendants.

JOINT PROPOSED SCHEDULE

Plaintiff Wisconsin Gas LLC (“Wisconsin Gas”), and Defendants American Natural Resources Company (“ANR”), and Honeywell International, Inc. (“Honeywell”) (together, the “Parties”), by and through their respective undersigned counsel, hereby provide the following status report to the Court and submit the joint proposed schedule pursuant to the Court’s October 6, 2021 Text Order (ECF No. 34):

1. On October 26, 2021, Honeywell answered the Amended Complaint (ECF No. 38).
2. The Parties exchanged initial disclosures consistent with the deadline ordered by the Court.
3. For the last several months the Parties have been engaging in active written discovery, which although not concluded, is expected to be nearing conclusion within the next few months.

4. Counsel for the Parties met and conferred by videoconference on April 22, 2022 to discuss a further discovery schedule and the next phase of the case. The Parties propose the following:

- a. The parties shall continue with written fact discovery through **July 25, 2022**.
- b. The Parties shall submit a further joint proposed schedule no later than **July 29, 2022**. The Parties contemplate that the next schedule will propose a phased approach to further litigation, including dates addressing threshold issues of liability and dispositive motion practice in connection with same.

Wherefore, the Parties request that the Court enter the foregoing proposed joint schedule.

Respectfully submitted,

Dated: May 2, 2022

/s/ Joseph A. Cancila, Jr.

Joseph A. Cancila, Jr.
Matthew Kennison
RILEY SAFER HOLMES & CANCILA LLP
70 West Madison Street, Suite 2900
Chicago, IL 60602
(312) 471-8700
(312) 471-8701 (fax)
jcancila@rshc-law.com
[mkennison@rshc-law.com](mailto:mkenison@rshc-law.com)

James Goldschmidt
QUARLES & BRADY LLP
411 E. Wisconsin Avenue, Suite 2400
Milwaukee, WI 53202
(414) 277-5663
james.goldschmidt@quarles.com

Attorneys for Wisconsin Gas LLC

/s/ James F. Thompson

James F. Thompson
Mitchell F. Engel
SHOOK, HARDY & BACON LLP
2555 Grand Boulevard
Kansas City, MO 64108

(816) 474-6550
jfthompson@shb.com
mengel@shb.com

*Attorneys for American Natural Resources
Company*

/s/ J. Timothy Hobbs

J. Timothy Hobbs
Ankur K. Tohan
K&L Gates LLP
925 Fourth Avenue, Suite 2900
Seattle, WA 98104
(206) 370-7664
Tim.hobbs@klgates.com
Ankur.tohan@klgates.com

Attorneys for Honeywell International, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2022 I electronically transmitted the foregoing to the Clerk's Office using the CM/ECF System, which will send notice of the filing to counsel for all parties having appeared of record.

s/ Joseph A. Cancila, Jr.

Joseph A. Cancila, Jr.

RILEY SAFER HOLMES & CANCILA LLP

70 W Madison Street

Suite 2900

Chicago, IL 60602

(312) 471-8750

jcancila@rshc-law.com